

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

GINNIE MCKNIGHT, JACQUELINE  
GARRISON, and ADRIANA DE LEÓN,  
individually and on behalf of all similarly  
situated individuals,

*Plaintiffs,*

V.

UNITED AIRLINES, INC., a Delaware corporation, and UNITED AIRLINES HOLDINGS, INC., a Delaware corporation,

*Defendants.*

Case No. 1:23-cv-16118

Hon. Georgia N. Alexakis

Mag. Hon. Jeffrey T. Gilbert

## JOINT STATUS REPORT

Pursuant to the Court’s February 4, 2025 Order (Dkt. 64), Plaintiffs, Ginnie McKnight, Jacqueline Garrison, and Adriana De León, and Defendants, United Airlines, Inc. and United Airlines Holdings, Inc. (jointly, “United”), submit the following Joint Status Report:

1. **Written Discovery.**

- Both parties have served and answered the first sets of written discovery, including producing responsive documents.
- United has requested that Plaintiff Garrison produce certain documents identified during her January 31, 2025 deposition and is conferring with Plaintiff's Counsel on this issue.
- Plaintiffs issued a second set of discovery requests on February 18, 2025. United is preparing its response, due March 20, 2025.

2. **Depositions.**

- Plaintiff Garrison's deposition was completed on Friday, January 31, 2025.
- Plaintiff De León was scheduled to be deposed on Friday, February 21, 2025. On February 18, 2025, Plaintiffs' Counsel indicated that Plaintiff De León's deposition was canceled and that they intended to remove her as a Plaintiff-Class Representative. The parties are discussing Plaintiffs' proposed amended complaint.
- Plaintiff McKnight is scheduled to be deposed on March 25, 2025.
- No other depositions have been noticed. Plaintiffs' counsel previously indicated that they would be seeking to depose several technicians but those depositions have not yet been scheduled. Plaintiffs' counsel anticipates issuing subpoenas for these depositions and working with the subpoena respondents to schedule them.

3. **Subpoenas.**

- Plaintiffs previously issued subpoenas to IPCS (aka DataFit), Quest Diagnostics, NovaCare, and Concentra. Plaintiffs are still in the process of obtaining all relevant documents.

- On January 16, 2025, Plaintiffs issued a subpoena to U.S. Mobile Health Exams (USMHE), in response to which USMHE provided responsive documents.

Plaintiffs' counsel produced those documents to United on February 20, 2025.

Dated: February 27, 2025

Respectfully submitted,

GINNIE MCKNIGHT, JACQUELINE  
GARRISON, and ADRIANA DE LEÓN,  
individually and on behalf of all similarly  
situated individuals

UNITED AIRLINES, INC. and UNITED  
AIRLINES HOLDINGS, INC.

By: /s/ Andrew T. Heldut (w/consent)

By: /s/ Ada W. Dolph

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*Counsel for Plaintiffs and the putative class*

*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 27, 2025 a true and correct copy of the foregoing document was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses denoted on the electronic Mail Notice List.

/s/ Ada Dolph